

**LEE LITIGATION GROUP, PLLC**

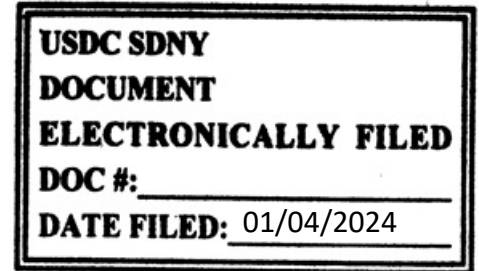
148 WEST 24<sup>TH</sup> STREET, EIGHTH FLOOR  
NEW YORK, NY 10011  
TEL: 212-465-1180  
FAX: 212-465-1181  
INFO@LEELITIGATION.COM

WRITER'S DIRECT: 212-465-1188  
cklee@leelitigation.com

**VIA ECF**

The Honorable Stewart D. Aaron, U.S.M.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

December 28, 2023



Re: *Estrada v. B & S Zeeman, Inc. et al*  
Case No.: 1:23-cv-05904

Dear Judge Aaron:

We are counsel to Plaintiff and write to inform the Court of a discovery dispute.

The parties met and conferred in accordance with Rule 26 of the Federal Rules Civil Procedure on December 11, 2023. In the conference, the parties agreed upon a discovery plan. Given the nature and stage in the lawsuit, the parties were to schedule depositions in the month of January 2024. Defendants agreed to check their availability for depositions. Defendants have failed to do so and remain unresponsive to Plaintiff's requests. Counsel for Plaintiff has requested availability since December 6, 2023, via email and during the meet and confer on December 11, 2023. Counsel for Plaintiff also followed up via email on December 11, 2023, and December 19, 2023.

In addition, Defendants' initial disclosures are overdue as of December 27, 2023. Based on the above, Plaintiff respectfully requests the Court's intervention to compel deposition dates, and for Defendants to provide initial disclosures.

Respectfully,

/s/ C.K. Lee  
C.K. Lee, Esq.

Plaintiff filed his Letter Motion on 12/28/2023 seeking to compel Defendants to provide deposition dates and initial disclosures. (See ECF No. 26.) Defendants timely filed their Letter Response on 1/2/2024 stating that defense counsel was "diligently following up to provide deposition dates" and that initial disclosures had been served on 1/2/2024. (See ECF No. 27.) Plaintiff failed to timely file any reply.

Plaintiff's Letter Motion is GRANTED IN PART. If Defendants have not yet provided deposition dates to Plaintiff, they shall do so no later than 1/19/2024. Plaintiff's Letter Motion otherwise is DENIED AS MOOT.

Dated: 01/04/2024

*Stewart D. Aaron*